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ABSTRACT

The report presented here is a follow-up and complement to a first report, which was submitted in 1978 to the Dean of the College of Arts and Sciences at the University of Alaska (Fairbanks). The general question underlying this report concerns the adequacy or inadequacy of this university's program offerings with respect to foreign language (FL) preparation. (Foreign language in this report stands for any non-English language.) The sources of this report are articles published in news and professional magazines and journals, statistical data from various sources, college catalogs, and responses to a questionnaire sent to 25 universities. The report treats the following topics: (1) arguments for FL learning; (2) recent past and present status of FL instruction in the U.S.; (3) data on FL instruction on the undergraduate level in U.S. universities; (4) FL instruction on the graduate level; and (5) the requirement question. The report recommended that a committee of faculty and students from various disciplines be formed to study the adequacy of language preparation at the University, the desirability of reintroducing the language requirement, and the forms such a requirement might take. (AMH)

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Department of Linguistics
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University of Alaska, Fairbanks

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FOREIGN LANGUAGES IN THE EIGHTIES: What Is To Be Done? A Second Report

Wolf Hollerbach

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PREFACE:

A year ago, in November 1978, the Department submitted to the Dean of the College of Arts and Sciences, upon the latter's request, a "Comprehensive Report on Foreign Language Programs." It discusses the structure and philosophy of the program, its objectives, limitations, and methodology as well as a series of special questions and problems such as enrollment trends, attrition, intensity of instruction, individual study courses, faculty qualifications, teaching loads, student body composition. Appendices contain, among other information, statistical data on foreign language (henceforth FL) programs in 20 U.S. universities of approximately the same size. The present Report, submitted upon the request of the Chairman of the Academic Council, is viewed by the Department as a follow-up and complement to the first one.

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0. Preliminary Remarks

0.1 The Topic of this Report

The general question that underlies this report concerns the adequacy or inadequacy of this university's program offerings with respect to FL preparation. One aspect of the question that needs to be discussed in some detail is the problem of FL requirements. It should be added that the term "foreign language" is, in the American context, a misnomer. Are Indian or Eskimo languages "foreign" ones? Is Spanish - spoken by some 15 million Americans as their first language - a "foreign" language? FL then stands here for any non-English language. It is used purely for convenience's sake.

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0.2. Sources of Information Used in this Report

1. A number of miscellaneous sources were drawn upon: articles published in national news magazines such as Newsweek and in professional publications such as Hispania, CFLTA News, ADFL Bulletin; the Report entitled "Strength through Wisdom" submitted November 1979 by the President's Commission on Foreign Language and International Studies; personal conversations (as with MLA representative Richard J. Brod or with the father of the Commission, Congressman Paul Simon); material handed out at professional conventions such as PNCFL or ACTFL; personal contacts with FL teachers in the Northwest and in Alaska; etc.

2. Statistical data contained in The College Handbook 1979-80, The College Board, New York, 1979 and in Graduate Programs and Admissions Manual 1977-79, Graduate Record Exam Board, 1979, were collected, analyzed and tabulated.

3. Out of 25 questionnaires sent out, 17 have been received to date from the following universities: Rice University, State University of New York at Albany, Boston University, George Washington University, Idaho State University, Ohio State University, Southern Illinois University, Syracuse University, University of California at Berkeley, University of Michigan at Ann Arbor, University of Pittsburgh, University of Tennessee, University of Wisconsin at Milwaukee, Wayne State University, Arizona State University, Case Western Reserve University and Cornell University.

4. Fifteen university catalogs (1977 and later) available on campus were consulted to gain some insight into how other universities deal with the specific problem of FL requirements. Current catalogs of 10 top universities were requested but had not arrived on time to be consulted for this report.

1. Arguments for FL Learning

The reasons frequently given for learning languages other than one's mother tongue can be grouped into three broad categories.

1.1. Reasons pertaining to General Education

Learning a FL is a very effective means to achieve awareness of one's mother tongue, and of language in general. Learning a FL allows contrastive comparison; it permits us to look at our own language through the eyes of, for example, a Spanish or Japanese speaker. It is thus not surprising that FL learning improves literacy in English. Yale University president Giamatti recently stressed this point, and the Florida Association of English Teachers recognized it by a resolution. We estimate that about 15-20% of classtime in elementary and intermediate FL courses per semester is spent on teaching general and English grammar. FL instruction belongs to the very core of the liberal

arts. These are "liberal" because they "liberate" man. Most - Philosophy, English, Music, Art, etc. - liberate him from the confines of the "business of daily survival". FL go further: they liberate us from the confines of our own culture, from the straight jacket of one mode of thinking and feeling, of one world vision that is, by necessity, narrow. By contrasting our culture with other cultures FL as an academic discipline helps us become more aware of our cultural identity. A man cannot understand his "manness" unless he also has some understanding of "womanness".

1.2. Pragmatic and Career-related Reasons

FL provide us with a broader skill base. Knowing two or more languages we possess a tool which often makes the difference between obtaining a job or not. In a recent article in Newsweek (July 30, 1979), Senator Fulbright states that one out of every 8 jobs in industry, and one out of every 6 jobs in agriculture, depends on international trade; and the Albuquerque Tribune refers to a recent study according to which about 100,000 jobs per year cannot be filled by Americans because they lack FL qualifications. A working knowledge of one or more FL is required or desirable for many jobs in such different careers as: the media, teaching, foreign service, translation and interpreting, law, music, medicine, aviation, library, any business dealing with foreign countries, social work, nursing, politics, military, churches, etc. etc.

Specifically in academe, FL knowledge can be extremely useful as a tool in research, and by implication an important asset when seeking admission to graduate school. Much is translated, of course, but much also is not. If forced to rely entirely on translation, the researcher depends on somebody else's decision of what is deemed important and what is not, and often has to cope with more or less considerable delays. Sometimes the tool-value of FL is overemphasized in academic discussions. It is not the only, and probably not the most important justification for learning FL at the university level. Even for the graduate student, that is the future specialist, the acquisition of a FL is far more than the acquisition of a tool. In this context the notion that a computer language is equivalent to, and therefore substitutable for a FL raises serious questions. Do we allow our elementary school students to substitute reading for mathematics?

1.3. Society-related and Geopolitical Reasons

Language is the most tangible symbol of culture, that is of all that which holds society together. Language is a politicum of the highest order, as can be seen the world over and throughout history. (Consider for example the Welsh, the Irish, the Belgian, the Basques, etc.). The question for the U.S. is this: can a profoundly multiracial and multi-cultural country afford to be uni-lingual, by determination or laziness? Today, the nation is awakening to its basic

multiplicity. Language instruction plays an important, a crucial role in this redefinition of the country's future path and self-understanding.

In an age when ethnic and cultural assertion is becoming a powerful historical force, no country, least of all a world power like the U.S., can afford not to promote FL instruction on all levels of its educational system. As Third World countries emerge and Fourth World countries start to awaken, linguistico-cultural imperialism such as has been practiced by the industrialized nations, above all the U.S., will be increasingly resented and rejected. The day is past when we could take for granted that other nations would accept English as the lingua franca of the world. The current Iranian crisis has also a language dimension: Senator Fulbright, in the article mentioned above, reveals that in 1978 only 9 out of 60 Foreign Service officers in Iran spoke the language of the country.

Being able to communicate effectively with friends, partners, and enemies is a must for a world power like the U.S. The U.S. has sadly neglected this basic aspect of international politics. A few figures may illustrate the point: it is difficult to find a fully qualified interpreter of Chinese or Japanese in the Foreign Service (Senator Fulbright). Whereas there are estimated to be 10,000 English-speaking Japanese businessmen in New York alone, there seem to be fewer than 900 American businessmen in all of Japan, and only a handful of them speak Japanese (Commission Report). A few years ago, the U.S. Ambassador in a major European country did not speak a word of the language of that country.

2. Recent Past and Present Status of FL Instruction in the U.S.

2.1 The Abolishment of FL Requirements

The first Report shows that, throughout its history, the University of Alaska has demonstrated a strong commitment to FL teaching. A decisive event in the recent past was the dropping, in 1971, of the FL requirement. The University followed then the lead of many other U.S. universities. Whereas in 1965 90% of U.S. institutions of higher learning had a graduation and 33% an admission FL requirement, in 1974, those figures were 53% and 18% respectively. The repercussions have been dramatic for high school and college enrollments and general program offerings throughout the country. According to Leslie Kruhly, "The U.S.: Tongue-tied on Languages", an article reprinted September 1979 in Clipper, in 1977/78 fully 20% of public high schools in the U.S. offered no languages at all, only 15% of all high school students study a FL (as compared to 24% in 1965), and a mere 2% go beyond the 2nd year. The picture is not much brighter for the university level: less than 9% of college students are enrolled in FL classes. The alarming conclusion is that "the United States is the only industrial nation in the world that doesn't require foreign language exposure for all students."

2.2 Why were FL Requirements Dropped?

It is worthwhile to ask why FL requirements were dropped at the end of the sixties and the beginning of the seventies. One reason is certainly the general "no-restraints" philosophy that prevailed in education at that time and that has since been recognized as abusive and excessive. Another important reason was the obvious discrepancy between expectations of students, parents, administrators, the general public and even FL teachers on the one hand and the actual results of FL instruction on the other. Several factors contributed to widen this gap, prominently among them the early euphoria of the then new audio-visual methodology, the appearance of the language laboratory, which was at the time widely considered the absolute success-machine in FL learning, and--paradoxically--also the extremely strong emphasis on speaking, that is to say on the skill that is the most difficult to develop and the easiest to lose. But there were, and still are, other problems: FL instruction in the U.S. begins far too late in the education process; not all FL teachers are adequately trained; school principals not infrequently assign personnel to FL classes without regard to qualifications; opportunities for in-service training and professional development are often scarce, etc.

2.3 The Present - a Period of Transition

Where does FL instruction in the U.S. stand today? It is not easy to present a clear and convincing picture. Trends and attitudes seem to be changing now, and truly up-to-date nation-wide information is not yet available. In general, however, FL instruction seems to be gaining ground again. FL high school enrollments generally appear to be up even though nationally the increase is not as dramatic as it has been locally here in Fairbanks (approximately 85% between 1977 and 1979 for all FL combined). The interest in Latin and Greek is growing to the point where some school districts experience difficulties in finding qualified teachers. An increasing number of colleges and universities are enforcing or reintroducing FL requirements. And the appointment in 1978, by President Carter, of the Commission on Foreign Language and International Studies points to a national awakening to the problem of what the Commission calls our "scandalous incompetence in foreign language", adding that "nothing less is at issue than our national security".

3. Data on FL Instruction on the Undergraduate Level in U.S. Universities

3.1 Enrollment Comparison 1974-1977
(ADFL Bulletin, May 1978)

	Percentage
1974	100%
1977	87.9% *

*These figures are preliminary (with 88% of all institutions surveyed): "the final total will be very close to the 1974 figures."

3.2 FL Enrollment in % of Total University Enrollment
(Kruhly, 1979)

	Nation	UAF
1977/78	8.9%	7.9%

3.3 FL Requirements in U.S. Universities and Colleges in 1978
(No up-to-date nation-wide figures are available.)

(1) Institutional Profile
(Source: The College Handbook 1979-80)

Total # Institut. Surveyed	Large Public Universities	Private Inst. (5000+) and Small Pub. Univ.	Priv. Inst. (5000-)	Military Academies
98	23	11	62	3

Although, statistically speaking, the data base is rather limited, the profile is supposed to be reasonably correct.

(2) Sample List of Institutions with Some Form of FL Requirement:
(various sources)

Harvard, Berkeley, Princeton, Indiana U, U of North Carolina, U of Washington, Columbia U, Duke U, Brown U, Emory U, State U of New York, Albany (and other campuses); Cornell U, U of Pittsburgh, U of Massachusetts, Amherst and Boston; Rutgers U (several campuses), U of Vermont, U of Texas, San Antonio; U of Virginia, U of Oregon, Washington State U, Oregon State U, Pennsylvania State U, Arizona State U, Hofstra U, Seton Hall U, Vanderbilt U, Marquette U, U of Tulsa, U of Toledo, Brandeis U, Tuft U, Wellesly College, Colgate U, Notre Dame U, Reed College, College of Wooster, Sweet Briar College, Pacific Lutheran U, Willamette U, Wheaton College, Duquesne U, Haverford College, etc., as well as the U.S. Naval Academy, Annapolis, the U.S. Military Academy, West Point, the Virginia Military Institute, Lexington.

It will be noted that some of the leading U.S. institutions of higher learning have either kept or reintroduced or begun to reapply FL requirements. Among those that received national attention is Harvard that now requires students, besides demonstrating competence in a FL, to take at least one course in a foreign culture; if the latter is a Western culture, the course is conducted in the respective FL. Berkeley requires 3 years of one FL or 2 years of two FL for admission.

4. FL Instruction on the Graduate Level

4.1 Graduate Programs with FL requirements in % of Total # of U.S. Institutions

(Source: Graduate Programs and Admissions Manual 1977-79)

The source used is supposedly quite exhaustive. The tables show the discipline; the total number of institutions offering graduate programs in that discipline, the total number of institutions with some form of FL requirement on the Master's or Ph.D. level, or both; the percentage of the latter in terms of the former. For comparison purposes, the UAF column indicates by a "+" that the corresponding graduate program here also has a FL requirement, whereas a "-" indicates that it has none. A blank shows that UAF does not offer a graduate degree in the discipline.

100-70%

Discipline	Grand Total	# with FL Requirement	Percentage	UAF
Classics	75	66	88	
Comparative Lit.	63	54	85.7	
Philosophy	134	106	79.1	
Pharmacy	40	31	77.5	
Area Studies	83	62	74.6	
Anthropology	116	85	73.2	±
Linguistics	81	59	72.8	
Basic Med. Sci.	108	77	71.2	

69-50%

English	327	223	68.1	+
Chemistry	293	191	65.1	-
History	325	215	64.6	
Zoology	102	65	63.7	+
Biochemistry	140	86	61.4	
Political Sci.	228	122	53.5	
Geography	116	61	52.5	
General Engr.	107	55	51.4	-

49-30%

Discipline	Grand Total	# of FL Requirement	Percentage	UAF
General Biology	318	158	49.6	+
Geosciences	166	82	49.3	+
Mathematics	313	153	48.8	-
Music	224	53	46.8	-
Sociology	204	89	43.6	
Fine Arts	181	35	43.	-
Physics	240	103	42.9	+
Mech. Engr.	142	59	41.5	-
Statistics	71	29	40.8	
Agronomy & Soil Sci.	53	21	40.3	
Forestry & Nat. Res. Mgmt.	58	22	37.9	+
Civil Engr.	135	50	37.	-
Dramatic & Creative Arts	146	32	34.9	

29-20%

Speech, Rhetoric & Debate	114	33	28.9	
Psychology	303	87	28.7	
Economics	231	63	27.2	
Humanities & Lib. Arts	49	13	26.5	
Computer & Info. Sci.	141	36	25.5	
Horticulture	43	10	25.5	
Mass Comm. & Journ.	122	27	22.1	

19-10%

Discipline	Grand Total	# of FL Requirement	Percentage	UAF
Public Health	54	9	16.6	
Business & Mgmt.	191	26	13.6	-
Secondary Ed.	329	41	12.4	-
Physical Ed.	207	25	12.	
Public Admin.	187	22	11.7	
Elementary Ed.	338	37	10.9	

9-0%

Social Work	71	2	2.8	

4.2 Interpretation of Data

According to one's point of view, one can interpret most of these data in a positive or negative fashion. An illustrative example is Comparative Literature which, with the second highest percentage value, ranks in the very top group. Yet one may ask why the value is not 100%, how any comparative literature program can do without a FL requirement. From the point of view of what ought to be, similar questions could be raised about other programs, for example: Area Studies, Linguistics, English, History, Political Science, Geography, Physics, Speech, Humanities, Journalism, Public Health, Business, Education, Social Work.

5. The Requirement Question

5.1 Preliminary Remarks

1) FL requirements are defined as either admission requirements, or graduation requirements. Both may be imposed university-wide, or may be related to certain degrees, (for example the B.A.), or to certain programs (for example Philosophy) or - sometimes - to individual needs (for example, an anthropological thesis involving research in Peru).

Graduate requirements have always been more frequent than admission requirements. Some universities have a combination of both.

FL requirements can be categorized as undergraduate level requirements (which are usually justified in terms of general education or career preparation) and graduate level requirements, (usually defined in a very narrow fashion as a research tool requirement).

2) University FL requirements have a serious impact on FL instruction in high schools. Indeed, when requirements were widely dropped by U.S. universities, FL enrollment in high schools plummeted, and FL programs were abolished in schools across the nation (for some figures, see 2.1). A similar though less visible relationship exists between graduate level and undergraduate level FL requirements. Therefore, any discussion of FL requirements should encompass, besides considerations relating to society at large, possible implications for FL instruction on lower levels.

5.2 Modes of Defining FL Requirements

1) The Time Definition

Sometimes FL requirements are defined in terms of the time spent learning a FL. This definition is mainly used for admission requirements. The norm seems to be 2-3 years of high school. The time criterion can be criticized for not being very pertinent and for allowing too much variation (three years in one high school may be equivalent to one year in another).

2) The Credit Definition

FL requirements are often defined in terms of the number of credits taken in a FL. The norm seems to be a minimum of 12-16 semester college credits or the equivalent. A similar criticism - too much variation - can be raised here, too.

3) The Level Definition

The FL requirement can be formulated in terms of the instructional level reached. The norm seems to be the successful completion of a fourth or fifth semester college course, usually in one's own school. This may be considered as a very practical solution since it gives the institution itself an immediate control over the quality of the requirement (and not just over its quantity, as the two preceding definitions do).

4) The Competence Definition

FL requirements are frequently formulated also in terms of proficiency obtained. Whereas this criterion appears to be the most logical and pertinent of all, it raises some serious questions with regard to proficiency testing. There are (a) national tests, and many schools use them. The school itself can decide the percentile cut-off point below which the desired proficiency is deemed not achieved. There is of course the question of what competence level the institution should aim for. A further difficulty may be the test structure itself. In some extreme cases, a student can prepare specifically for the test and pass it without really possessing the long-term proficiency in the language the test is supposed to measure. This is a problem above all with reading ability tests. Proficiency may also be tested (b) locally. The advantage is flexibility, the possibility to tailor the testing mechanism to individual needs, especially the specialization of the student. A student in history, for example, would be tested perhaps as to different types of competency and on different material than a student in nursing. For this reason the local test may appear to satisfy the school's needs more easily than the national tests. However, this very flexibility may also open the door for accusations of unfairness, of excessive severity or excessive leniency in comparison with supposed national norms. Local testing usually implies considerable additional work for the FL department(s) (unless the tests are administered by the various disciplines themselves, which in turn raises questions about the integrity of the procedure). Or it may mean that occasionally another unit puts considerable pressure on the department responsible for the local test to let student X pass.

From the above it can be concluded that there is a choice of criteria and modes of defining FL requirements and that each type of definition has advantages and disadvantages. The usual practice of universities seems to be to define FL in more than one way so as to provide the student with a choice of how he can satisfy the requirement.

5.3 Requirements and Levels of Achievement

In spite of great variety, as to the formulation of FL requirements, there seems to be a general consensus on what a FL requirement should mean.

Undergraduate Level: the student should possess a good knowledge of the basic grammatical structures of the language, and a basic working vocabulary; he should be able to read and understand ordinary modern texts and speak and write it simply but reasonably correctly. He should furthermore have some comprehension of the respective culture.

Graduate Level: the student should be able to read comfortably texts in his own discipline and in related fields, in one FL for the master's, and in one or two FL for the Ph.D. level.

It will be noted that in the formulation of the consensus there are several ill-defined words, in particular "good knowledge, basic structures, basic working vocabulary, ordinary texts, fluently, comfortably". These are the price to be paid for having a consensus.

What learning effort will be necessary to reach these objectives? It is clear that no general, hard-and-fast answer can be given. There are too many variables, above all: the whole range of student ability, motivation, study habits, etc.; the general instructional intensity of a FL program; the availability of specialized courses; the degree of difficulty, for the English speaker, of various languages; the quality of the instructor as well as the student body in his class; etc. However, with all due precaution, some indication can be given.

In the context of our present programs and student public, an ordinary student with average ability, good motivation and work habits who begins his FL learning at the university level, could reach the undergraduate achievement level in two years, by taking 101/102 and 201/202, for a total of 16 credits for French, German and Spanish, or 18 credits for Russian. For Japanese more time would be required (a) because the Elementary Japanese is offered for 3+3 credits (instead of 5+5 as in the other languages) and (b) because the writing system poses difficulties that do not exist in the other languages.

The graduate level achievement could be reached by means of specialized reading courses, in one or two semesters, for 3-5 credits, in French, German and Spanish, and a minimum of two to three semesters in Russian.

To put these figures into perspective one should consider the following data from research performed by the Foreign Service Institute (quoted in Report I, p. 12): in the very concentrated FSI programs, the average student needs 720 hours of instruction to attain a "limited working proficiency" in French, German, Spanish, and 1320 hours in Russian. Or, as Senator Fulbright says, perhaps somewhat overstating the point: "Two years of study gives the student only a taste of the basics of the language."

In conclusion: what a FL requirement as outlined above could do for the student is (a) provide a solid basis for actual use with modest ambitions and a point of departure for continuing study; (b) awaken his interest in, and awareness of, other modes of thinking, other cultures, language in general and his own language in particular.

5.4 Meaningful Requirements in Practice

Any type of compulsory activity provokes resistance. Academic requirements are no exception. Therefore, if requirements are to be adopted, it is imperative to formulate them in a framework, and to administer them in a fashion, that minimizes opportunities, reasons or pretexts for negative reactions. If required courses in any discipline are for example put off by student and advisor until the last moment, they will be viewed mainly as obstacles and create needless anxiety and ill will.

A meaningful requirement practice can probably be reduced to three basic principles:

a) Requirements should be formulated within a narrower rather than wider academic framework. This is all the more important when dealing with young adults. Children will accept any subject as a required one as part of the over-all school program. Undergraduate students will do so less readily if the required course or courses cannot be tied in with specific, tangible academic goals. Unless a university has, or plans to establish, a general-education core program for all or most of its students, defining FL requirements as university-wide requirements is less effective than defining them as degree-related or even as major-related requirements. The student then "buys" them as part of the specific academic package he wants to obtain from the university.

b) The value of required courses, and thereby the reason for the requirement, should be made visible. This is as much the responsibility of the faculty representing the required subject as of the faculty in general, and of advisors in particular. No requirement, whether it be in English, Speech, History, Mathematics, FL or Arctic Survival, can be successful unless it is carried and supported by a genuinely convinced faculty.

c) For most requirements considerations of timing are important. FL courses should be taken as early as possible in the student's college career. This applies to undergraduate and graduate levels. FL learning involves doing, practicing, repetition as well as intellectual understanding. FL learning demands time, regular exposure and practice until a certain minimal level of achievement is reached. A student who has had some FL before entering the university and who does not continue with his language, will find that, with every month of interruption and non-use, his competence will diminish. And the student who begins his FL acquisition only at the college level will need time to develop skills, knowledge and insight. Once a certain mastery is accomplished, momentary non-use is less critical. Lack of a certain minimal FL ability, in other words, should be considered as a deficiency that needs to be filled as soon as possible.

5.5 FL Requirements - Desirable?

The Department's position regarding FL requirements is ambivalent. Some of us remember well those years towards the end of the sixties when classes were full, but largely with unresponsive, unwilling students. On the other hand we are convinced as much as ever of the crucial importance of FL languages as part of a general, truly liberal education, as a tool for research and scholarship, as a pragmatic preparation for job opportunities and professional careers, as an education needed for the future. And we are convinced that the efforts to counteract a long tradition of isolationism need to be made at every level and by every institution and group in the country. Although ideally basic FL instruction should principally be carried out by ele-

mentary and high schools as it is done in virtually all other industrialized nations, it would be unrealistic to expect that such an educational revolution will come overnight. We are convinced then that colleges and universities must play an important part in this attempt to open young minds, to open the nation's mind to the world around us. They must play this role by actually providing the best possible FL teaching as well as by showing pre-college schools the way.

There are indications that American attitudes toward FL are changing. A recent study by the University of Michigan Research Center (April 1979) shows that more than 93% of Americans believe FL should be studied in junior and senior high school; 75% believe that elementary schools should offer FL; 38% think colleges and universities should have FL admission requirements; and another 38% think colleges and universities should have a FL graduation requirement.

6. Recommendation

The Department recommends that the Chairman of the Academic Council appoint a committee consisting of faculty members representing the Arts and Humanities, Natural Sciences, Social Sciences, Education, Engineering and Foreign Languages, as well as student representatives, to determine

a) whether the University of Alaska, Fairbanks prepares its students in all fields adequately with respect to foreign languages;

b) whether it is desirable to reintroduce foreign language requirements at the University of Alaska, Fairbanks; and

c) if so, which form(s) such a requirement should take and how it should be defined and administered.